

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

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ROBIN ALESSI, et al.,	)	
	)	
	)	
v.	)	<b>Civil Action No. 3:25-cv-00445-K</b>
	)	
SYNAGRO TECHNOLOGIES, INC., et	)	
al.,	)	
Defendants.	)	
	)	

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**UNOPPOSED MOTION FOR LEAVE TO FILE BRIEF AS AMICUS CURIAE**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that the City of Fort Worth, Texas; the Trinity River Authority; and the City of Austin, Texas (collectively, “Amici”), by and through their counsel, move for leave to file an amicus brief in this action under Local Rule 7.2(b).

The grounds for this motion, as detailed in the accompanying proposed amicus brief, are as follows:

1. Amici have unique information and perspectives on governmental immunity and biosolids operations beyond what the parties have provided that they believe will assist the Court in evaluating the pending Motions to Dismiss (Doc. Nos. 43, 45).
2. Additionally, Amici have interests that may be affected by the Court’s decision—preserving, as an enumerated governmental function, statutory governmental immunity for political subdivisions that operate wastewater treatment facilities and manage resulting sewage sludge and biosolids as a public service.

**CERTIFICATE OF CONFERENCE**

Pursuant to L.R. 7.1(b), Amici conferred with counsel for Plaintiffs and Defendants.

Plaintiffs and Defendants do not oppose this motion.

Dated: July 10, 2025

Respectfully submitted,

MARTEN LAW, LLP

/s/ Jessica K. Ferrell

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*LR 83.7 Admission and LR 83.9 Pro Hac  
Vice Applications Pending*

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CITY OF FORT WORTH

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TRINITY RIVER AUTHORITY

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was filed with this Court's CM/ECF system and was thus served electronically upon all registered counsel of record.

Dated: July 10, 2025

/s/ Jessica K. Ferrell  
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